

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

City of Chicago,

*Plaintiff,*

v.

DoorDash, Inc. and Caviar, LLC,

*Defendants.*

Civil Action No. 1:21-cv-05162

Hon. Jeremy C. Daniel  
Magistrate Judge Jeffrey T. Gilbert

**JOINT STATUS REPORT**

Pursuant to this Court's orders dated December 23, 2022 (ECF No. 90) and December 19, 2022 (ECF No. 87) directing the parties to file a status report seven days after each rolling production deadline to provide information about the last rolling production, what has been produced to date in total, and what remains to be produced, the parties hereby file this Joint Status Report concerning the November 22, 2024 production deadline.

**I. Status of the City's Document Productions**

**A. Documents Produced by the City To Date**

As of November 1, the City has produced 10,559 documents, totaling 70,187 pages, in rolling productions. The City's prior productions are described in more detail in the prior joint status reports (ECF Nos. 96, 101, 105, 109, 115, 151, 164, 174, 194, 200, 202, 216, 230, 234, 242, 246, 249, 250, 282, 294, 304, 308, 309, 320, 322, 336, 343, 346, 353, 356, 357, 358, 361, 364). The City did not make an additional production on November 22, 2024.

**B. Remaining Documents to be Produced**

The City continues to review its overall production for completeness. The City produced documents responsive to RFP Nos. 41, 95 and 96 on September 6 and September 27. The City produced an updated privilege log on May 9, 2024, and supplemented the log on September 27, 2024 to include the documents it reviewed in accordance with the Court's rulings on July 25, 2024 concerning RFP Nos. 95, 96, and 41. The City expects to produce documents from our completed RFP No. 95 and 96 review by November 26, 2024. The City will produce a privilege log associated with this review by December 11, 2024.

**II. Status of DoorDash's Document Productions**

**A. Documents Produced by DoorDash to Date**

DoorDash made a production on November 15, 2024, which included additional documents from custodians Jonathan Berk, Jessica Lachs, and Charlton Soesanto—the custodians added pursuant to the Court's September 9, 2024 order (ECF No. 354). This production also included quarterly versions of spreadsheets and hyperlinked documents, which DoorDash agreed to produce at the City's request. Since August 2022, DoorDash has produced a total of 8,070 documents and 45,634 pages across 32 productions. The documents produced to date include:

- Custodial documents responsive to the City's document requests relating to minimum amount promotional discounts, non-partner restaurants, Dasher pay, consumer fees, and menu pricing;
- Documents identified in known non-custodial locations;
- Documents identified from DoorDash's review of documents produced in related investigations and litigations; and

- Spreadsheets that were created in order to respond to the City's requests for specific data.

**B. Remaining Documents to be Produced**

Subject to ongoing meet-and-confer efforts regarding the scope of the parties' discovery obligations in light of the Court's ruling regarding the statute of limitations, DoorDash has substantially completed its production of documents from custodians added by the Court in its September 9, 2024 order (ECF No. 354). DoorDash is collecting, reviewing, and producing documents responsive to the City's RFPs, Set Five, served on March 15, 2024. DoorDash also continues to collect, review, and prepare for production additional documents responsive to agreements reached between the parties ahead of the Court's motion-to-compel deadline on May 15, 2024.

DATED: November 26, 2024

Respectfully submitted,

**CITY OF CHICAGO DEP'T OF LAW,  
AFFIRMATIVE LITIGATION  
DIVISION**

By: /s/ Rebecca Hirsch  
Stephen J. Kane  
Rebecca Hirsch  
121 N. LaSalle St.  
Room 600  
Chicago, IL 60602  
Phone: (312) 744-6934  
stephen.kane@cityofchicago.org  
Rebecca.hirsch2@cityofchicago.org

**COHEN MILSTEIN SELLERS & TOLL PLLC**

By: /s/ Brian E. Bowcut  
Brian E. Bowcut (*pro hac vice*)  
1100 New York Avenue, NW, Suite 500  
Washington, D.C. 20005  
Phone: (202) 408-4600  
bbowcut@cohenmilstein.com

Lisa M. Ebersole (*pro hac vice*)  
88 Pine Street, 14th Floor  
New York, NY 10005  
Phone: (202) 408-4600  
lebersole@cohenmilstein.com

*Attorneys for Plaintiff City of Chicago*

**GIBSON, DUNN & CRUTCHER LLP**

By: /s/ Michael Holecek  
Joshua S. Lipshutz (pro hac vice)  
1050 Connecticut Avenue NW  
Washington, DC 20036  
Phone: (202) 955-8500  
jlipshutz@gibsondunn.com

Michael Holecek (pro hac vice)  
Cynthia Chen McTernan (pro hac vice)  
333 S. Grand Avenue  
Los Angeles, CA 90071  
Phone: (213) 229-7000  
mholecek@gibsondunn.com  
cmcternan@gibsondunn.com

**FORDE & O'MEARA LLP**

By: /s/ Michael K. Forde  
Michael K. Forde  
Brian P. O'Meara  
191 North Wacker Drive  
31st Floor  
Chicago, Illinois 60606  
Phone: (312) 641-1441  
mforde@fordellp.com  
bomeara@fordellp.com

**RILEY SAFER HOLMES  
& CINCILA LLP**

By: /s/ Patricia Brown Holmes  
Patricia Brown Holmes  
Sarah E. Finch  
70 W. Madison Street  
Suite 2900  
Chicago, IL 60602  
Phone: (312) 471-8700  
pholmes@rshc-law.com  
sfinch@rshc-law.com

*Attorneys for Defendants DoorDash, Inc. and Caviar,  
LLC*